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Caption in Compliance with D.N.J. BLR 9004-1(b)

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Company, Berkley Insurance Company, Berkshire Hathaway Specialty Insurance Company, U.S. Specialty Insurance Company, and XL Specialty

Insurance Company

In re: Chapter 11

BLOCKFI INC., et al., Case No. 22-19361 (MBK)

Debtors.¹ (Jointly Administered under a Confirmed Plan)

The Wind-Down Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965); and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

BLOCKFI INC. AS THE WIND DOWN DEBTORS,

Plaintiff,

v.

Adv. Proc. No. 24-01067 (MBK)

ACE AMERICAN INSURANCE
COMPANY, ARCH INSURANCE
COMPANY, AXIS INSURANCE
COMPANY, BERKLEY INSURANCE
COMPANY, BERKSHIRE HATHAWAY
SPECIALTY INSURANCE COMPANY,
ENDURANCE AMERICAN SPECIALTY
INSURANCE COMPANY, NATIONAL
UNION FIRE INSURANCE COMPANY OF
PITTSBURGH, PA, U.S. SPECIALTY
INSURANCE COMPANY, XL SPECIALTY
INSURANCE COMPANY, XL SPECIALTY
INSURANCE COMPANY,

Defendants.

JOINT NOTICE OF APPEAL

Arch Insurance Company, Berkley Insurance Company, Berkshire Hathaway Specialty Insurance Company, U.S. Specialty Insurance Company, XL Specialty Insurance Company, Endurance American Specialty Insurance Company, National Union Fire Insurance Company of Pittsburgh, Pa., ACE American Insurance Company, and Axis Insurance Company (collectively, the "Appellants"), by and through their undersigned counsel, hereby submit this joint notice of appeal and respectfully state as follows:

Part 1: Identify the appellants:

1. The names of the Appellants are: Arch Insurance Company, Berkley Insurance Company, Berkshire Hathaway Specialty Insurance Company, U.S. Specialty Insurance Company, XL Specialty Insurance Company, Endurance American Specialty Insurance Company, National Union Fire Insurance Company of Pittsburgh, Pa., ACE American Insurance Company, and Axis Insurance Company.

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- 2. All of the Appellants appeal the Opinion (defined below) and Order (defined below) insofar as they pertain to a ruling on *The Wind-Down Debtor BlockFi, Inc.'s Motion for an Order Remanding State Court Action* [ECF No. 2181-1]. Arch Insurance Company, Berkley Insurance Company, Berkshire Hathaway Specialty Insurance Company, U.S. Specialty Insurance Company, XL Specialty Insurance Company and ACE American Insurance Company also appeal the Opinion and Order insofar as they pertain to a ruling on the *Motion to Enforce Plan and Confirmation Order* [ECF No. 2221-1].
 - 3. The Appellants are parties in interest in the above-captioned bankruptcy cases.

Part 2: Identify the subject of this appeal:

4. This appeal is from the *Memorandum Decision* [ECF No. 2303; Adv. Proc. No. 24-01067 Doc. 48] (the "Opinion") and *Order Granting in Part the Motion to Enforce; and Granting the Motion for Remand* [ECF No. 2302; Adv. Proc. No. 24-01067 Doc. 49] (the "Order") entered on May 13, 2024 in the main bankruptcy case (22-19361) and on May 21, 2024 in *BlockFi Inc. v. Arch Insurance Company et al.*, Adv. Proc. No. 24-01067 by the United States Bankruptcy Court for the District of New Jersey. A copy of the Order is attached as **Exhibit A** and a copy of the Opinion is attached as **Exhibit B**.

Part 3: Identify the other parties to this appeal:

5. The parties to the Opinion and Order from which this appeal is taken are:

Party: Attorneys:

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Signed this 21st day of May, 2024

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